

Resource Conservation and Recovery Act
Hazardous Waste Management Unit Closure Plan

Pries Enterprises
Independence, Iowa
EPA ID#981716806
Project No. 42905060

RCRA



53440

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Resource Conservation and Recovery Act
Hazardous Waste Management Units Closure Plan
Pries Enterprises
Independence, Iowa
EPA ID #ID981716806
Job No. 42905060

1.0 INTRODUCTION

This document describes the proposed plan of closure for a drum storage area at the Pries Enterprise facility, Independence, Iowa. This area was used for the storage of fifty-five (55) gallon drums containing regulated hazardous waste listed as F019 and characterized as D007. Drummed waste had reportedly accumulated in the drum storage area in excess of the 90 day limit for small quantity generators specified in Title 40 Code of Federal Regulations (CFR) part 264.1. Pursuant of the requirements of 40 CFR part 264, the Environmental Protection Agency (EPA) Region VII required that the storage area undergo closure. The consent agreement and consent order Docket Number VII-88-H-0034 became effective as of April 3, 1990.

Pries Enterprises (Pries) intends to close the drum storage area in a manner that minimizes the need for further maintenance; and controls, minimizes, or eliminates to the extent necessary to protect human health and environment, post closure escape of hazardous waste, hazardous constituents, leachate, contaminated runoff, or hazardous waste decomposition products to the ground or surface waters or the to atmosphere; and addresses closure requirements of 40 CFR section 264.112 and 40 CFR section 264.258.

2.0 FACILITY INFORMATION

2.1 Facility Description

The Pries facility is located at 701 17th Street, Independence, Iowa. Pries is an aluminum extruder with fabrication/assembly capabilities. A site location map constructed from a United States

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Geological Survey (USGS) 7.5 minute topographic map (photo revised in 1972) is presented as Figure 1, Appendix 1.

2.2 Regulated Waste Generation

In 1986 construction began at the Pries Enterprise Independence, Iowa facility to add the capability of painting aluminum extrusions. The painting operation was designed to hang the extrusion horizontally and lower the extrusion into seven (7) dip tanks for cleaning and etching, parts drying, paint application, and paint curing. The first tank contained an alkaline phosphate cleaner to wash the extrusion, the extrusion then went through two (2) tanks containing water for rinse, before being dipped in a tank containing hexavalent chromium. The last three (3) tanks involved a water rinse, a sodium hydroxide and sodium phosphate seal followed by a final rinse with deionized water.

Pilot studies were run on the painting operation. Due to poor performance the operation was never put into full production. Pilot studies were suspended in the fall of 1987. Suspension of painting operation studies required draining and treatment of water in tanks used in the cleaning and etching process. Treatment of the water generated sludge which was stored in fifty-five (55) gallon drums on-site. Forty-nine (49) drums of waste sludge had been generated by June 1988. Chemical Waste Management (CWM) in Oakbrook, Illinois shipped forty (40) drums of the waste to their CID landfill in Calumet City, Illinois. Thirty-four (34) additional drums were generated during the cleanup and were shipped along with the remaining nine (9) drums on November 4, 1988 by CWM to CID in Calumet City, Illinois.

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2.3 Description of Drum Storage Area

The former drum storage area will undergo closure as a rectangular lot approximately twenty-five (25) feet long by ten (10) feet wide. The surface of the lot consists of approximately four (4) inches of concrete placed over fill material. Fill materials consist primarily of sand. No construction joints intersect the former drum storage area. The surface of the storage area is flat and relatively level based on visual estimates. The drum storage area is not surrounded by a spill containment structure (curbing). The nearest unpaved area is outside the building wall approximately two and one-half ($2\frac{1}{2}$) feet from the storage area. During an August 5, 1991 site visit by Terracon personnel the paved surface was observed to have dark staining over most of the area identified as the former drum storage area. Pries personnel identified the staining as carbon used as a dry lubricant in their extrusion process. The Terracon field engineer on-site observed that the concrete pad was in good condition. No cracking was present in the drum storage area. No sumps or drains were observed within the area. The nearest sump was located approximately twenty-five (25) feet to the east of the storage area. This area is shown on Figure 3, Appendix 1. Photographs of the former drum storage area and surrounding areas are included in Appendix 2. The orientation of the photographs is indicated on Figure 4, Appendix 1.

2.4 Maximum Inventory of Accumulated Waste

On February 11, 1988 forty-nine (49) drums of sludge were stored in the drum storage area. Forty (40) of these drums were shipped out in June 1988. Thirty-four (34) additional drums of sludge were generated during the cleanup of the painting operations over the period May 28, 1987 to November, 1988. The total quantity of waste generated from this facility is approximately forty-six hundred (4600) gallons. The maximum quantity stored in the storage area at

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one time was approximately twenty-seven hundred (2700) gallons. The facility never went into full production on the paint line. The facility does not currently operate the line and does not generate, store or treat hazardous waste.

3.0 CLOSURE ACTIVITIES

3.1 Performance Standard

In accordance with 40 CFR part 265.111 this closure plan was prepared in order that the drum storage area undergoing closure will not require further maintenance and control subsequent to the completion of closure activities. This closure specifies a clean closure of the drum storage area under the current regulatory definition (i.e., closure leaving de minimus wastes or waste residues in place). Closure performance proposed for this closure is a maximum concentration of total chromium of five (5) milligrams per liter (mg/l) in rinse water generated as described below. Rinse water and solid waste generated during closure procedures will be sampled and tested for the presence of chromium. Water or solid waste exhibiting chromium concentrations above five (5) mg/l will be managed in accordance with applicable hazardous waste regulations.

3.2 Drum Storage Area Cleaning

The drum storage area shown on Figure 3 will be cleaned to remove residual hazardous substances on the concrete pad and adjacent walls. The concrete and adjacent walls of the former drum area will be swept. Solid waste will be collected and a representative sample will be collected for analysis. After sweeping the adjacent concrete pad, it will be washed two times with mops and a hot solution of water and inorganic cleanser such as Alconox. Between each cleaning, fresh solution and mop heads will be obtained. Following the second wash, the area will be rinsed with clean

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potable water. During the cleaning and rinsing procedure water will be retained in moping buckets. After each wash a sample will be collected from the bucket prior to placing remaining water in a fifty-five (55) gallon drums.

Water quantity will be minimized to limit runoff and facilitate capture of the rinsate. Prior to initiation of the cleaning process, absorbent pads will be laid down between the storage area and any construction seams in the concrete. Care will be taken to prevent the escape of water from the closure area. Liquid and solid residue generated during the cleaning process will be containerized and samples will be collected for analytical testing of chromium to determine the disposal method. Following the rinse cycle, a sample of the final rinsate will be collected for analytical testing of chromium. If the concentration of chromium exceeds the performance standard, the decontamination process will be repeated. Brushes, containers, and personal protective equipment used to clean the container storage area will be cleaned with an inorganic cleanser and rinsed with potable water. Rinsate will be contained and samples will be collected for analytical testing of chromium. Solids collected during closure activities will be containerized, tested as outlined above and disposed of per current state and federal guidelines.

3.2.1 Sample Analysis

Test Methods employed for the analysis of chromium samples will be USEPA SW-846 test method 6010. The method detection limit (MDL) for this method is 0.1 mg/l. Samples will be collected in sample containers and preserved consistent with USEPA SW-846 protocols. Wastes showing chromium concentrations above the proposed five (5) milligrams per liter cleanup objective will be handled as a

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hazardous waste and will be managed in accordance with applicable state and federal hazardous waste regulations.

3.2.2 Quality Assurance

Chain-of-Custody (COC) forms and appropriate sample request forms will be completed and submitted to the laboratory with the analytical samples. Copies of the completed COC forms and analytical reports will be included in the Closure Documentation Report (CDR). The laboratory chosen to conduct sample analyses is National Environmental Testing, Inc. (NET), Bartlett, Illinois. The laboratory will conduct analyses in accordance with their quality assurance/ quality control (QA/QC) plan entitled "NET National Quality Assurance Plan-January 10, 1990". Quality assurance, including duplicate/field blank analyses and a copy of NETs QA/QC plan will be provided with the CDR.

3.3 Health and Safety

Prior to initiation of closure activities a site safety plan will be prepared for personnel designated for participation in closure activities. Site safety during closure activities will be maintained in accordance with pertinent Occupational Safety and Health Act (OSHA) requirements under CFR 29 part 1910.120 to for the health and safety of workers involved in the closure. Documentation of employee training will be provided in the CDR. Closure of the drum storage area is not expected to present an unusual fire protection or fugitive emission problems.

3.4 Certification of Closure

Closure and decontamination activities will be conducted under the supervision of an independent professional engineer registered in the state of Iowa. Upon completion of closure, Pries will submit to the EPA a certification signed by it's designated representative

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and the professional engineer, per 40 CFR subsection 265.115 that the storage area has been closed in accordance with the approved closure plan. Documentation supporting the engineer's certification, including analytical results, chain-of-custody forms, and photographs documenting the storage pad cleaning procedures will be furnished with the certification. The certification will be submitted to the USEPA within sixty (60) days of completion of closure activities.

3.5 Schedule of Closure

The closure schedule is shown below. The schedule will begin with the approval of the USEPA and will end with certification by the professional engineer. Pries or their representative will notify the EPA in writing at least thirty (30) days prior to the date on which closure activities will be initiated. In accordance with 40 CRF part 264.112 (c) (2) (iii), the EPA will be notified and amendments made to the closure plan if unexpected events occur during closure plan implementation.

<u>Days Following Final</u> <u>Approval of Closure Plan</u>	<u>Closure Activity</u>
0	USEPA grants final Closure Plan Approval
30	Implementation of Closure Plan Begins
75	Receipt of Analytical Results
120	CDR with Closure Certification Provided

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3.6 Status of Facility After Closure

Following closure of the former drum storage area in accordance with the requirements specified in 35 IAC parts 724 and 725, Pries facility will no longer generate hazardous waste. Should Pries begin generation of hazardous waste in the future, the facility will operate in accordance the regulations applicable to generators of hazardous waste specified in 40 CRF part 262.

3.7 Financial Assurance

Financial assurance information will be supplied by Pries under separate cover.

4.0 GENERAL COMMENTS

The analysis and opinions expressed in this report are based upon data obtained from field activities and from any other information discussed in this report. This report relied on readily accessible information and was not designed to provide extensive data accumulation, chemical or radiological analyses or any reference as to the surface of subsurface air, soils, or groundwater other than as specified.

This closure plan is prepared for the exclusive use of our client for the specific application to the project discussed and has been prepared in accordance with generally accepted environmental engineering practices. No other warranty, expressed or implied is made. In the event any changes in nature or location of suspected sources of contamination as outlined in this report are observed, the conclusions and recommendations contained in this report should not be valid unless the changes are reviewed and the opinions of this report are modified or verified in writing by the geoenvironmental engineer.

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September 4, 1991
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Very truly yours,

TERRACON ENVIRONMENTAL, INC.



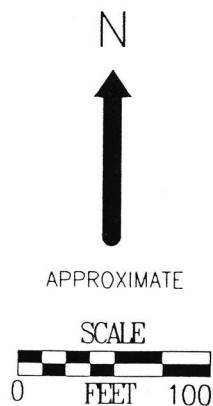
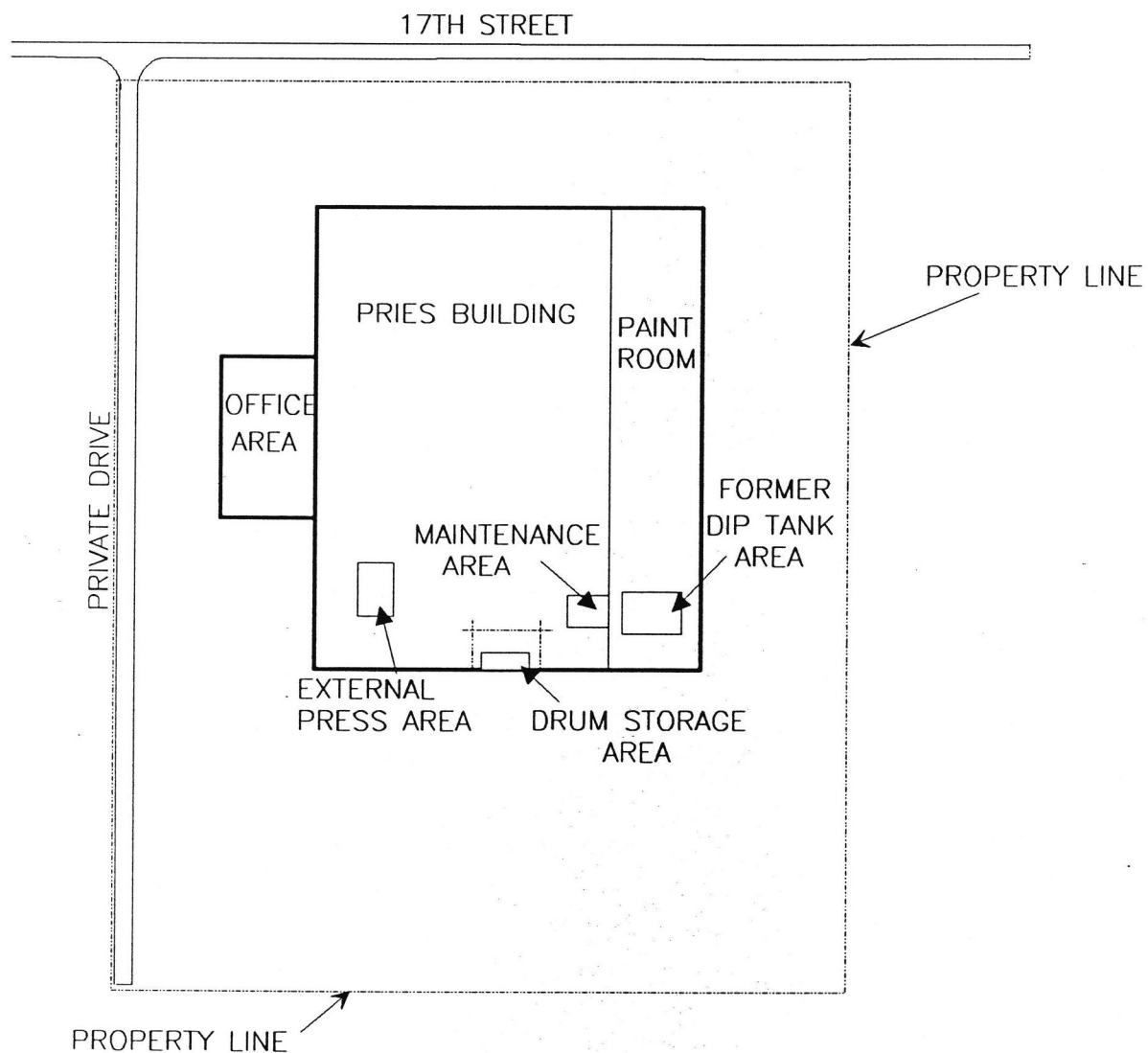
Robert E. Hoffman, EIT
Project Manager



John F. Hartwell, P.E.
Illinois P.E. #062-045559

REH/JFH/pc6

(05060-01.rpt)

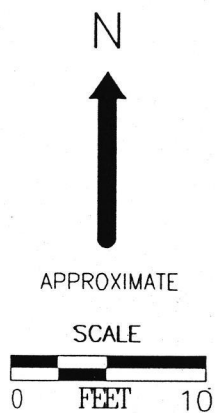
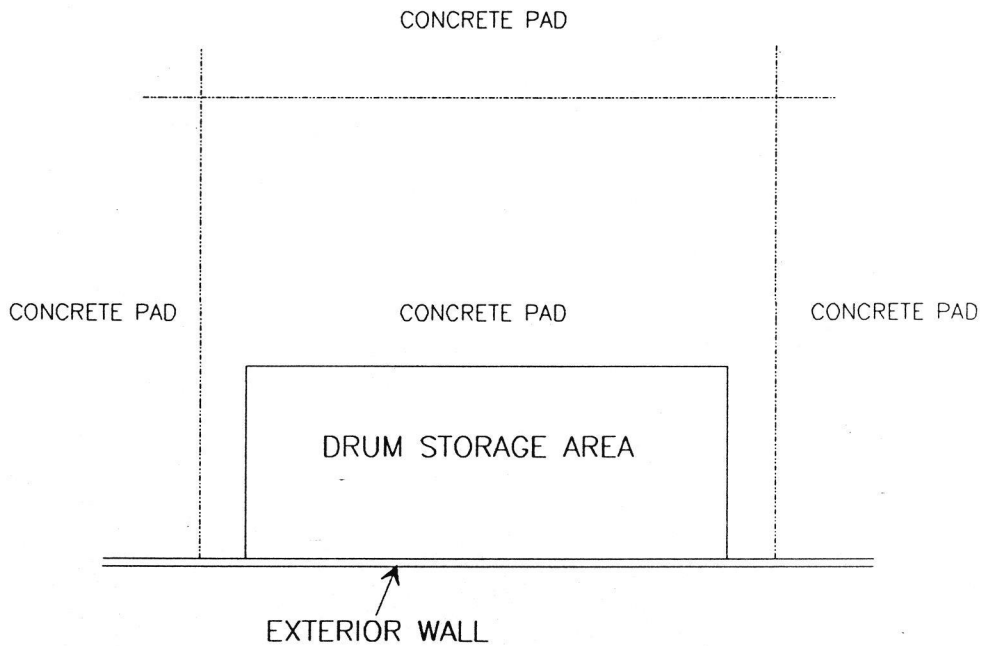


LEGEND

----- PROPERTY LINE

FIGURE 2.
SITE SKETCH
 PRIES ENTERPRISES
 701 17TH STREET
 INDEPENDENCE, IOWA
 PROJECT NO. 42905060
 FILE# 42905060 (1)

Terracon

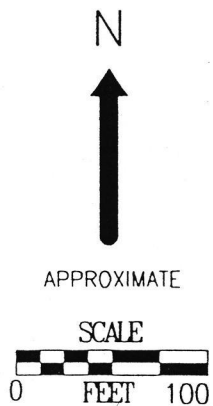
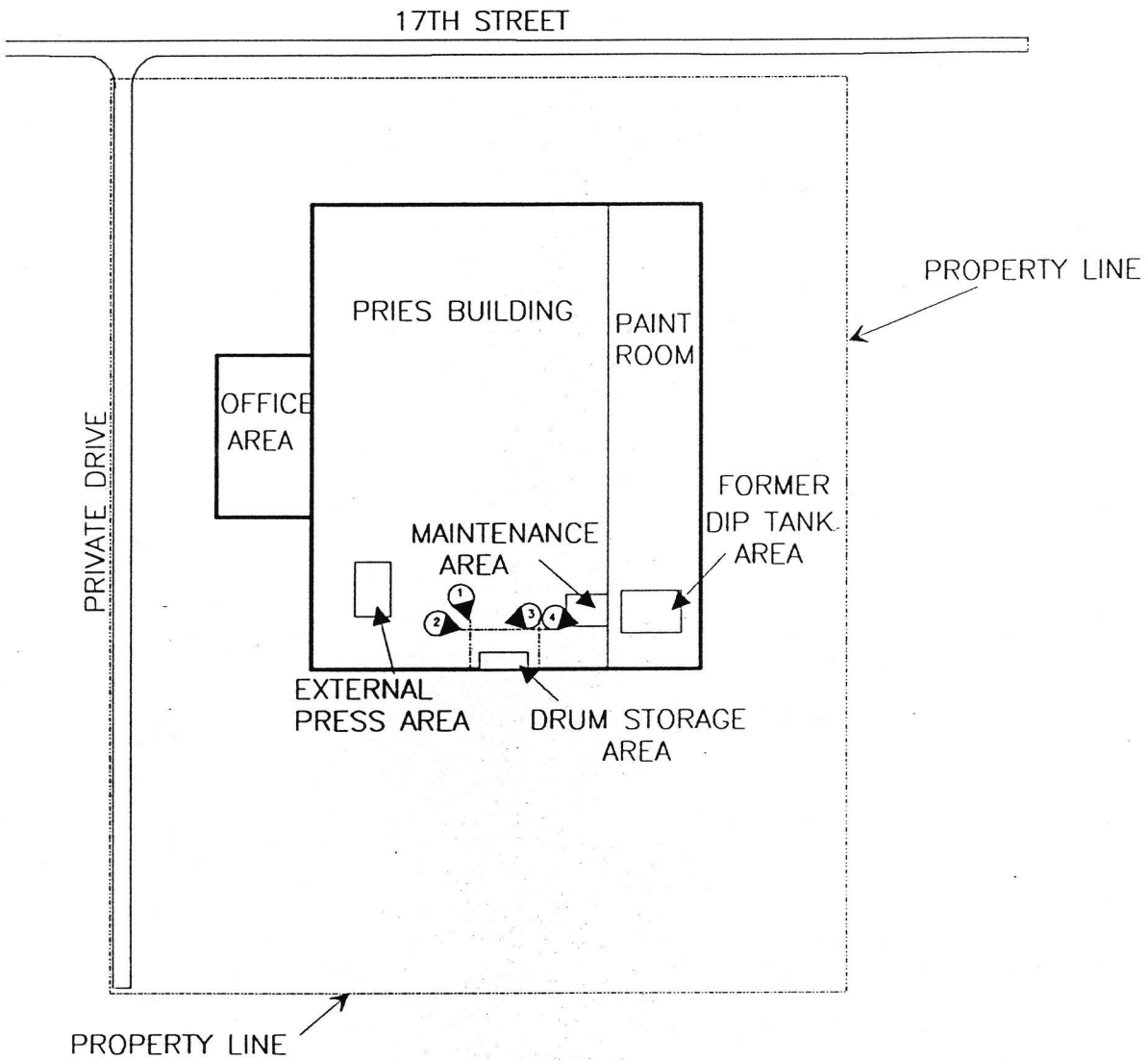


LEGEND

----- CONSTRUCTION JOINT

FIGURE 3.
DRUM STORAGE AREA SKETCH
 PRIES ENTERPRISES
 701 17TH STREET
 INDEPENDENCE, IOWA
 PROJECT NO. 42905060
 FILE# 42905060 (2)

Terracon



LEGEND

- PROPERTY LINE
- 📍 PHOTOGRAPHIC LOG

FIGURE 4.

PHOTOGRAPHIC REFERENCE SKETCH

PRIES ENTERPRISES
 701 17TH STREET
 INDEPENDENCE, IOWA
 PROJECT NO. 42905060
 FILE# 42905060 (3,1)

Terracon



1



2



3



Holmes & Holmes
Lawyers

Wendell A. Holmes
John W. Holmes

Ten West Fourth Street
Suite 300
Post Office Box 966
Waterloo, Iowa 50704

Telephone:
319-234-7506
FAX:
319-232-9579

September 9, 1991

RECEIVED

SEP 10 1991

FEDERAL EXPRESS: 9500566235
OVERNIGHT MAIL

IOWA SECTION

Mr. Don L. Lininger
Waste Management Division
United States Environmental Protection Agency - Region VII
726 Minnesota Avenue
Kansas City, Kansas 66101

Re: Pries Enterprises
Independence, Iowa
EPA ID #981716806
Terracon Project No. 42905060

Dear Mr. Lininger:

Enclosed please find two originals of the revised Closure Plan by Terracon Environmental, Inc., dated September 4, 1991, which my client received only today.

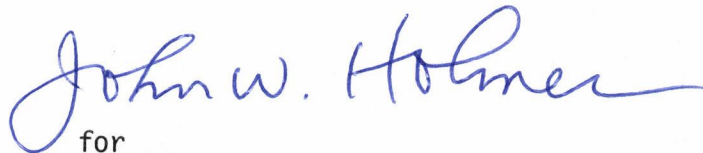
Also enclosed please find a copy of a letter from Commerce and Industry Insurance Company to Frank Dowie dated March 13, 1991, concerning Pries Enterprises, Inc., Pollution Legal Liability Premium Indication. In my conversations with Nancy Bacon, Esq., she agreed that a premium of \$20,000 or even \$10,000 was unreasonable. She only required that I seek other insurance at a reasonable cost. I have been waiting for the Pries Enterprises' Closure Plan which we only received today to see if I can get a more reasonable quote. In that connection, I am sure it will be very important for the insurance carrier underwriter to know whether we have the Closure Plan approved and whether the time table proposed in the Closure Plan has been accepted by you. In this regard, please notice paragraph 9(g)(1) of the Consent Agreement and Consent Order filed April 8, 1991 requires my client to "continue to attempt to establish liability coverage in the amount required...until respondent is notified in writing by EPA that such coverage is no longer necessary." In other words, it was expressly negotiated that I was permitted to seek coverage on the basis of a reasonable premium and that is what I am continuing to attempt to do.

Mr. Don L. Lininger
September 9, 1991
Page 2

Third, please find enclosed a copy of the legal description for the real estate in Independence, Iowa, where the facility is situated. As far as I can tell, Larson's Industrial Subdivision to Independence, Buchanan County, Iowa, has not formally been platted and filed. An unsigned copy of the developer's plat map for this subdivision is also enclosed. Figures 1 through 4 in the Closure Plan further show the relationship of the physical structures to the site.

We are submitting these to you in lieu of addressing them to Lynn Slugantz because that is the understanding which Mr. McMahon and I had following your visit on July 17, 1991.

Very truly yours,



for
HOLMES & HOLMES

JWH:jr

Enclosures:

CHICAGO REGIONAL OFFICE
Suite 1000
500 West Madison Street
Chicago, Illinois 60661-2511
312/930-5300

March 13, 1991

Frank Dowie
Brown & Diekman
500 Jefferson St.
Waterloo, Iowa 50701

RE: Pries Enterprises, Inc.
Pollution Legal Liability
Premium Indication

Dear Mr. Dowie:

The following constitutes our premium indication for the above caption account.

Limit of Liability: 1) \$ 1,000,000 / 2,000,000

Self-Insured Retention: A) \$ 50,000

Premium: 1A) \$ 20,000

Sudden and gradual pollution will be covered at the following locations using National Union Form #29700:

Pries Enterprises, Inc.
701 17th Street
Independence, Iowa 50644

The National Union Form will be modified as follows:

- 1) Non-owned disposal site exclusion.
- 2) Limit of Liability endorsement.
- 3) No coverage for radioactive or asbestos materials as per attached endorsements.
- 4) Underground storage tank exclusion.
- 5) Cumis Counsel endorsement.
- 6) New Extended Discovery Period endorsement.
- 7) Retroactive date to be inception of policy.



A Member Company of
American International Group

COPY

3-13-91

John:
I wanted to get the premium indication to you immediately - Received it at approximately 3:00 PM today. If any questions please give me a call. Thanks, [Signature]

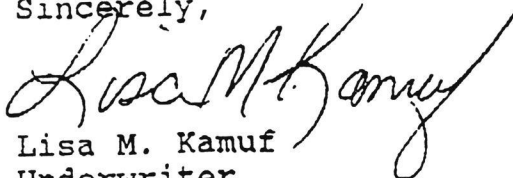
Mr. Frank Dowie
March 13, 1991
Page 2

The above indication is subject to the following:


- 1) Receipt of three to five years of financial information prior to binding (10k, 10q, or independently audited statement).
- 2) No coverage will be provided for underground storage tanks and associated underground piping unless satisfactory AIG approved integrity tests are performed. Written results to be forwarded to this office.
- 3) A minimum earned premium of 25% applies upon binding of coverage.
- 4) Satisfactory review of an Environmental Risk Assessment prior to binding by an AIG approved firm (see attached list). If Pollution Liability Insurance is placed with Commerce and Industry and AIG Consultants are used, this office will incur the fee.

This indication is valid until April 15, 1991.

Sincerely,



Lisa M. Kamuf
Underwriter
Pollution Liability

cc: Matt Henry 

enc

MAR 13 '91 15:11

AIG10WEST

391 P04

**COMMERCE AND INDUSTRY INSURANCE COMPANY
NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH
POLLUTION LIABILITY DIVISION
ACCEPTABLE ENGINEERING FIRMS**

AIG CONSULTANTS, INC.

Chicago, IL Peter Alvey (312) 930-1440

DEUEL & ASSOCIATES, INC.

Albuquerque, NM William Hinds (505) 345-8732

ENVIRONMENTAL RISK LTD.

Bloomfield, CT David Brandwein (203) 242-9933
 Gordon Brookman

ENVIRONMENTAL STRATEGIES CORP

Vienna, VA Doug Gladstone (703) 821-3700

PILKO & ASSOCIATES

Chicago, IL Gary Egleston (312) 444-2015

RISK SCIENCE INTERNATIONAL

Washington, DC Bob Kube (202) 342-2206
 John Haines

VERSAR, INC.

Oak Brook , IL Alan Jirik (708) 990-7555

Commencing at the Northeast corner of Lot 1, Block 2, Larson's Commercial Subdivision to Independence, Buchanan County, Iowa, being in Section 10, Township 88 North, Range 9 West of the 5th P. M.; thence North 89°59'00" East 618 feet along the South line of 17th Street Southeast extended to the point of beginning; thence continuing North 89°59'00" East 340.00 feet along the South line of 17th Street Southeast extended; thence South 0°00'00" East 440.00 feet parallel with the East line of Larson's Commercial Subdivision; thence South 89°59'00" West 340.00 feet parallel with said South line of 17th Street Southeast; thence North 0°00'00" East 440.00 feet to the point of beginning.

Said parcel contains 2.83 acres, more or less. The East line of Larson's Commercial Subdivision is assumed to bear North 0°00'00" East for the description.

Later to be described as Lot 3, Larson's Industrial Subdivision to Independence, Buchanan County, Iowa except the West 60 feet thereof.

Pries Enterprises
Independence, Iowa
EPA ID#981716806

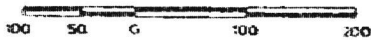
for

LEGAL DESCRIPTION



FINAL PLAT
LARSON'S INDUSTRIAL SUBDIVISION
INDEPENDENCE, IOWA
MAY 1985

DEVELOPER & OWNER: EDGAR & JANET LARSON
 INDEPENDENCE, IOWA



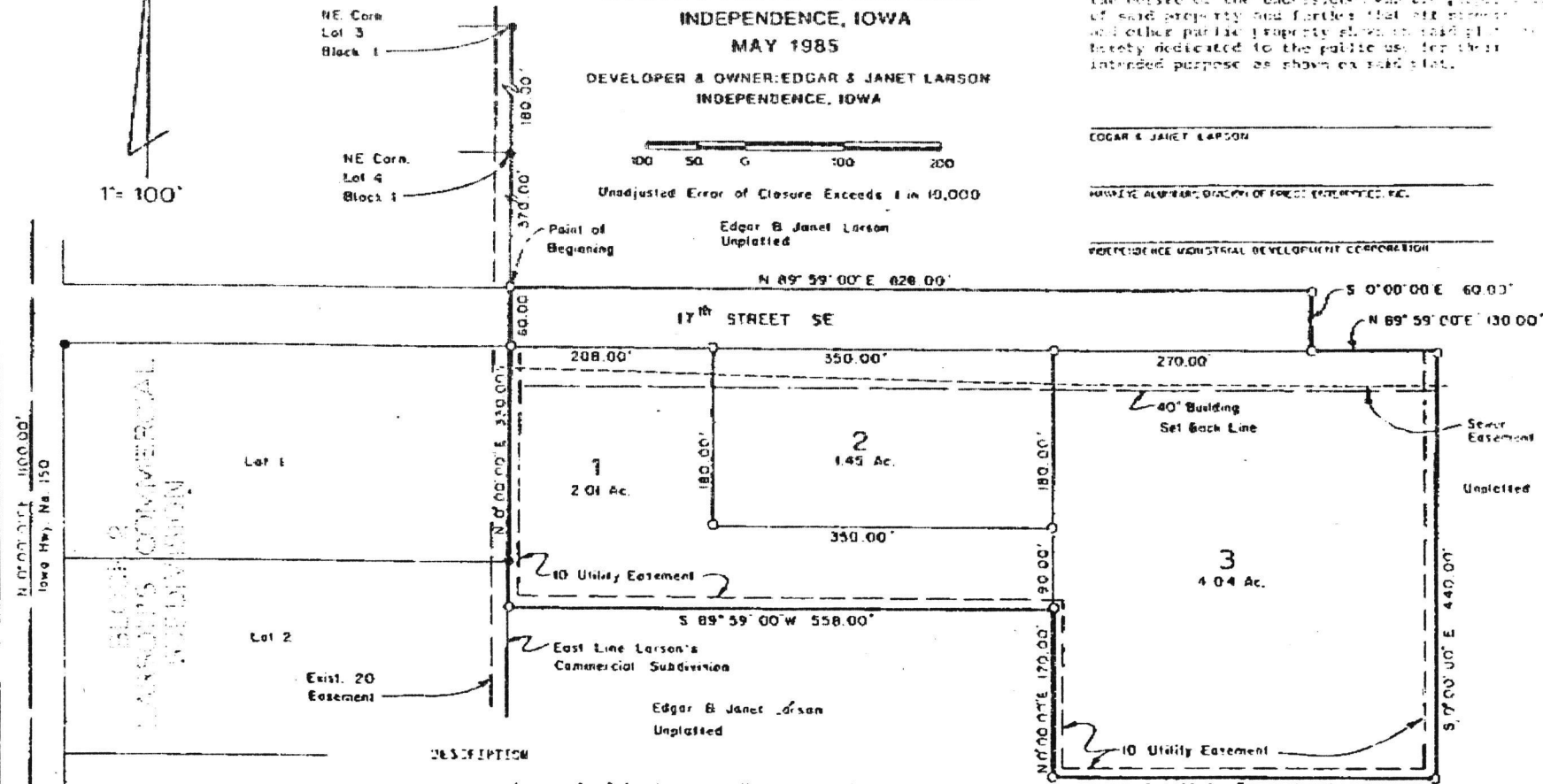
Unadjusted Error of Closure Exceeds 1 in 10,000

I hereby certify that this plat, map, survey or report was made by me or under my direct personal supervision and that I am a duly registered land surveyor under the laws of the State of Iowa.

EDGAR & JANET LARSON

HARVEY ALPHEUS DICKSON OF FREDERICKS, ILL.

INDEPENDENCE INDUSTRIAL DEVELOPMENT CORPORATION



DESCRIPTION

A parcel of land in the West one half of Section 10, Township 68 North, Range 9 East of the 5th P.M., Buchanan County, Iowa, more particularly described as follows:

Beginning at the Southeast corner of Lot 4 Block 1 Larson's Commercial Subdivision in the City of Independence, Iowa; thence North 89° 59' 00" East 620.00 feet along the North line of 17th Street Southeast extended; thence South 69° 00' 00" East 60.00 feet parallel with the East line of said Larson's Commercial Subdivision to the South line of 17th Street Southeast extended; thence North 89° 59' 00" East 120.00 feet along said South line thence South 00° 00' 00" East 440.00 feet parallel with the East line of said Larson's Commercial Subdivision; thence South 89° 59' 00" East 400.00 feet parallel with said North line of 17th Street Southeast; thence North 00° 00' 00" East 170.00 feet; thence South 89° 59' 00" East 558.00 feet to the East line of said Larson's Commercial Subdivision; thence North 00° 00' 00" East 330.00 feet along said East line to the Point of Beginning.

Said parcel contains 2.61 acres, more or less.

Notes: The East line of Larson's Commercial Subdivision was located to bear North 00° 00' 00" East for this description.

- Indicates Corners Set 5/8" Rebar w/Cap 9018
- Indicates Corners Found
- ▲ Indicates Section Corners

W 1/4 Corn. 10-88-9

I HEREBY CERTIFY THAT THIS PLAT, MAP, SURVEY OR REPORT HAS BEEN MADE BY ME OR UNDER MY DIRECT PERSONAL SUPERVISION AND THAT I AM A DULY REGISTERED LAND SURVEYOR UNDER THE LAWS OF THE STATE OF IOWA.

STEVEN L. BUSSE, L.S.

DATE _____ REG. NO. 9018

APPROVED BY CITY OF INDEPENDENCE	
CLERK	DATE
PLANNING	DATE
APPROVED - CITY OF INDEPENDENCE PLANNING & ZONING COMMISSION	
CHAIRMAN	DATE
FINAL PLAT LARSON'S INDUSTRIAL SUBDIVISION	
JENSEN, CARY & SHOFF CONSULTING ENGINEERS, INC. CIVIL, ENVIRONMENTAL, TRANSPORTATION STRUCTURAL & LAND SURVEYING 1000 W. 10th St. - Des Moines, IA 50319 (515) 281-1111	
MAY 16, 1985	SHEET 01